

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO.: 5:14-CV-899-BO

GUSTAVO ROMANELLO,)
)
 PLAINTIFF,)
)
 VS.)
)
SELENE FINANCE, LP)
)
 DEFENDANT.)

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER
OR OTHER RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

Defendant, Selene Finance LP (hereinafter "Defendant") respectfully moves the Court pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rule 6.1 of the Local Rules of the Federal Court for the Eastern District of North Carolina for an order extending time to answer or otherwise respond to Plaintiff's Complaint. In support of this motion, Plaintiff states as follows:

1. The Complaint was filed and a Summons issued on December 30, 2014 and the Defendant was served by Personal Service upon the Registered Agent, C T Corporation System by Process Server on December 30, 2014.

2. The current deadline for the Defendant to respond to Plaintiff's Complaint is January 20, 2015. The Defendant needs further time to investigate the facts and legal claims in the

Complaint in order to file its answer.

3. Defendant's counsel contacted the Plaintiff via the e-mail address stated in the Complaint and sought Plaintiff's position regarding this motion. Plaintiff responded that he had no objection to this motion.

4. The time to answer or otherwise respond has not yet expired.

WHEREFORE, Defendant Selene Finance LP respectfully requests that the Court enter an Order extending the time within which it may file an answer or otherwise respond to Plaintiff's Complaint up to and including February 10, 2015.

This the 7th day of January, 2015.

/s/James R. White
James R. White
N.C. State Bar No.: 29508
THE LAW OFFICE OF JOHN T. BENJAMIN, JR., P.A.
1115 Hillsborough Street
Raleigh, NC 27603
T: (919) 755-0060
F: (919) 755-0069
white@lawjtb.com

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CERTIFICATE OF SERVICE

I, James R. White, attorney for the Defendant, Selene Finance LP, hereby certify that I have this day filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER OR OTHER RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT** electronically with the Clerk of Court using the CM/ECF system, and that I have mailed a copy of the foregoing upon the other party to this action by placing said copy in a postage prepaid envelope, and depositing the same into the care and custody of the United States Postal Service, first class mail, addressed as follows:

Gustavo Romanello
5317 Cottage Bluff Lane
Knightdale, NC 27545

This the 7th day of January, 2015.

/s/James R. White
James R. White
N.C. State Bar No.: 29508
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